EC-2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8 999 18TH STREET - SUITE 500 DENVER, CO 80202-2466

FEB 1 8 1999

Ref: 8EPR-EP

Dan Jiron District Ranger Salt Lake Ranger District 6944 South 3000 East Salt Lake City, Utah 84121

RE: Draft Environmental Impact Statement (DEIS)
Brighton Ski Area Master Development Plan

Dear Mr. Jiron:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et Seq., and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed relevant portions of the Brighton Ski Area Master Development Plan DEIS.

Based on our review, we did not identify any significant environmental issues that were not at least partially addressed through alternatives analysis or with best management practices or proposed mitigation measures. The DEIS was comprehensive in providing baseline information and addressing concerns outlined in EPA's previous scoping letter. We appreciate the effort the Forest Service has made in thoroughly describing the proposed ski mountain upgrades and impacts associated with those improvements.

However, we would continue to urge the Forest Service to pursue additional alternatives for treatment of storm water pollutants associated with snow storage from parking areas. For example, could sediment ponds or other urban storm water treatment systems be designed into the snow storage system to provide additional treatment and removal of pollutants? Could a drainage system be designed in the existing parking area to a least treat runoff during melting events? We understand that other alternatives (i.e., snow melters and snow removal) were evaluated and rejected as costly or as impractical; however, we believe snow storage in wetlands has an adverse affect on the functions and values of these systems and believe that mitigation for these impacts is necessary.

Accordingly, Region VIII of the EPA has recommended a rating of EC-2, Environmental Concerns-Insufficient Information. Our concerns are based primarily on the need for identifying other alternatives to avoid adverse impacts to wetlands resources from snow storage in order to fully protect the environment. Moreover, we believe additional mitigation measures mentioned above could be evaluated to reduce the environmental impacts to the aquatic ecosystem.

Again, we appreciate Forest Service's efforts on this environmental document and the issues addressed therein. If you have any questions or concerns regarding these comments, please contact Sarah Fowler of my staff at 303/312-6192.

Sincerely,

Cynthia Cody Chief

NEPA Unit

cc: Brooks Carter, ACOE Bountiful Utah